

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

MAR 18 2014

ROBERTO C. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY *[Signature]*

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

TYLER BROCK STAFFORD,)

Defendant.)

No. _____

CR 14-080

R

Violations: 18 U.S.C. § 922(g)(1)
26 U.S.C § 5861(d)

INDICTMENT

The Federal Grand Jury Charges:

COUNT 1

On or about May 23, 2012, in Del City, Oklahoma, in the Western District
of Oklahoma,

----- **TYLER BROCK STAFFORD,** -----

having been previously convicted of a crime punishable by a term of imprisonment
exceeding one year, knowingly and unlawfully possessed a firearm, specifically: a
Mossberg model 500 shotgun, serial number J099616, which was in and affecting
interstate commerce in that the firearm had previously crossed state lines to reach the
State of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the
penalty for which is found in Title 18, United States Code, Section 924(a)(2).

COUNT 2

On or about May 23, 2012, in Del City, Oklahoma, in the Western District of Oklahoma,

----- **TYLER BROCK STAFFORD,** -----

knowingly and intentionally possessed a firearm, specifically: a Harrington & Richardson “Topper” model 16 gauge shotgun, serial number BB407664, having a barrel length of less than 18 inches in length (specifically, a barrel of approximately 14 inches in length) and an overall length of less than 26 inches (specifically, an overall length of approximately 20.5 inches), which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d), the penalty for which is found in Title 26, United States Code, Section 5871.

COUNT 3

On or about July 20, 2012, in Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **TYLER BROCK STAFFORD,** -----

having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed the following firearms:

- (a) Glock model 23 .40 caliber semi-automatic pistol, serial number FUY244;
and
- (b) Smith and Wesson model 61-3 .22 caliber semi-automatic pistol, serial
number B51782,

which were in and affecting interstate commerce in that the firearms had previously
crossed state lines to reach the State of Oklahoma.


All in violation of Title 18, United States Code, Section 922(g)(1), the
penalty for which is found in Title 18, United States Code, Section 924(a)(2).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "Mike Huckabee", enclosed within a large, loopy oval shape.

FOREPERSON OF THE GRAND JURY

SANFORD C. COATS
United States Attorney

A handwritten signature in black ink, appearing to read "Timothy W. Ogilvie", written in a cursive style.

TIMOTHY W. OGILVIE
Assistant United States Attorney